

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In re:

Vijay K. Taneja

Debtor.

Case No. 08-13293-SSM  
Chapter 11

**DEBTOR'S MOTION FOR APPOINTMENT OF CHAPTER 11 TRUSTEE**

COMES NOW, Debtor Vijay K. Taneja, by counsel, and moves pursuant to 11 U.S.C. §1104(a) for appointment of a Chapter 11 Trustee, and states in support thereof the following:

1. This case was commenced by a voluntary Chapter 11 filing on June 9, 2008.

Debtor is presently acting as Debtor-in-Possession.

2. There are four related cases (Elite Entertainment Inc. 08-13286; Financial Mortgage Inc. 08-13287; NRM Investments Inc. 08-13290; and Taneja Center Inc. 08-13292, hereafter referred to as the “Corporate Debtors”) which involved corporations the Debtor solely owned and controlled prior to the filing of those Petitions. Those cases were filed the same day as that of the instant Debtor.

3. Prior to the filing of the Petitions herein Debtor caused a third party (Steven Wexler and Marcher Consultants) to be installed as the party managing,

controlling and operating the aforementioned Corporate Debtors, and Mr. Wexler is presently doing so and serving the functions of designated representative for those Corporate Debtors.

4. Based on the facts and circumstances it is likely if not inevitable that one or more creditors on the Office of the United States Trustee will seek appointment of a Trustee in this Debtor's case so as to fulfill independent functions on behalf of the estate. In anticipation of, and in agreement with any such sentiment, Debtor hereby moves for appointment of that Trustee pursuant to 11 U.S.C. §1104(a) and agrees that said appointment is in the best interest of creditors and debtors.

WHEREFORE, Debtor prays for entry of an Order authorizing and directing an appointment of a Chapter 11 Trustee and for such other and further relief as the Court deems appropriate.

Vijay K. Taneja  
By Counsel

/s/ Thomas P. Gorman  
Thomas P. Gorman, VA Bar #26421  
Tyler, Bartl, Gorman & Ramsdell, P.L.C.  
700 South Washington Street, Suite 216  
Alexandria, VA 22314  
703-549-5010  
703-549-5011 fax

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Debtor's Motion for Appointment of Chapter 11 Trustee was mailed, postage prepaid, and sent via facsimile on the \_\_\_\_\_ day of June, 2008, to the parties listed below:

Office of the U.S. Trustee  
115 South Union Street, Suite 210  
Alexandria, VA 22314  
703-557-7279 fax

Bruce W. Henry, Esq.  
Henry O'Donnell Dahnke & Walther PC  
4103 Chain Bridge Road, Suite 100  
Fairfax, VA 22030

Steve Wexler  
Marcher Consultants, Inc.  
8230 Leesburg Pike, Suite 610  
Vienna, VA 22182

Brian F. Kenney, Esq.  
Miles & Stockbridge PC  
1751 Pinnacle Drive, Suite 500  
McLean, VA 22102

Christopher Jones, Esq.  
1317 King Street  
Alexandria, VA 22314

/s/ Thomas P.Gorman  
Thomas P. Gorman